

1 mother had struggled with her mental health some seven years earlier, had given
2 temporary custody of the child to a neighbor and known felon, and her boyfriend had
3 been convicted of child molestation 16 years earlier. In the instant case, the Defendants
4 cannot meet the even higher burden that the law places on them to justify use of religion
5 and race in making their decisions to deprive the Langs of their children for 425 days.
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7

8 9 CONCLUSION

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11 For the foregoing reasons, pursuant to Rule 12(c) of the Federal Rules of Civil
12 Procedure, this Court should grant the Plaintiffs' Motion for Judgment on the Pleadings in
13 their favor and against the Defendant City of Vancouver.
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15 Dated: August, 25th 2020

16 Respectfully submitted,

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